

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

**RACHAEL ANNE ELROD,
ANDREW KAUFMAN,
SARAH MARTIN, and
BROOKS BRASFIELD, on behalf
of themselves and all others
similarly situated,**

Plaintiffs,

v.

**NOTAX4NASH, MICHELLE
FOREMAN, KAREN MOORE,
And JOHN DOES 1-10,**

Defendants.

**KAREN MOORE and MICHELLE
FOREMAN**

Third-Party Plaintiff,

v.

**BEST SELLERS LLC, HEATHER
SELLERS, JOE GERGLEY, and
HYPERMETRICS LLC,**

Third-Party Defendants.

Case No. 3:20-cv-00617

Consolidated with Case No. 3:20-cv-00618

**Judge Eli J. Richardson
Magistrate Judge Barbara D. Holmes**

CLASS ACTION

JURY TRIAL DEMANDED

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26(c), Plaintiffs Rachael Anne Elrod, Andrew Kaufman, Sarah Martin and Brooks Brasfield, on behalf of themselves and all others similarly situated, Defendants NoTax4Nashville, Michelle Foreman, Karen Moore and Third-Party

Defendants Best Sellers LLC, Heather Sellers, Joe Gergley and Hypermetrics LLC respectfully move the Court to enter a Protective Order to preserve the confidentiality of documents and information disclosed through the discovery process in this matter. The parties have discussed the need for the entry of a Protective Order in this cause and have mutually agreed as to the wording of the proposed order, filed herewith.

Wherefore, the parties having mutually consented to the entry of the attached, hereby respectfully request that the Court enter the submitted Protective Order.

DATED: January 11, 2022

Respectfully Submitted,

/s/ D. Gil Schuette
D. Gil Schuette (#30336)
Evan Rothery (#37708)
SIMS|FUNK, PLC
3322 West End Avenue, Suite #200
Nashville, TN 37203
(615) 292-9335
ssims@simsfunk.com
gschuette@simsfunk.com

Counsel for Hypermetrics and Joe Gergley

/s/ Joe P. Leniski, Jr.
Joe P. Leniski, Jr. (TN Bar. No. 22891)
Anthony Orlandi (TN Bar No. 33988)
BRANSTETTER, STRANCH & JENNINGS,
PLLC
The Freedom Center
223 Rosa Parks Avenue, Suite 200
Nashville, Tennessee 37203
Telephone: (615) 254-8801
joeyl@bsjfirm.com
aorlandi@bsjfirm.com

/s/ John Spragens
John Spragens (TN Bar No. 31445)
SPRAGENS LAW PLC
311 22nd Ave. N.

Nashville, TN 37203
T: (615) 983-8900
F: (615) 682-8533
john@spragenslaw.com

Attorneys for Plaintiffs and the Proposed Class

/s/Darrick O'Dell
Darrick O'Dell
Spicer Rudstrom, PLLC
Philips Plaza
414 Union St., Suite 1700
Nashville, TN 37219
Telephone: (615) 259-9080
dlo@spicerfirm.com

/s/ Timothy G. Harvey
Timothy G. Harvey
Keane A. Barger
Riley Warnock & Jacobson, PLC
1906 West End Avenue
Nashville, Tennessee 37203
Telephone: (615) 320-3700
tharvey@rwjplc.com
kbarger@rwjplc.com

Attorneys for Defendant Karen Moore

/s/ G. Kline Preston, IV
G. Kline Preston, IV
Kline Preston Law Group, PC
4515 Harding Pike
Suite 107
Nashville, TN 37205
(615) 279-1619
Fax: (866) 610-9565
kpreston@klineprestonlaw.com

Attorney for Defendant Michelle Foreman

/s/ R. Scott McCullough
R. Scott McCullough
McNabb, Bragorgos, Burgess & Sorin, PLLC
81 Monroe Ave

Memphis, TN 38103
(901) 624-0640
smccullough@mbbslaw.com

/s/ Robert R. Laser, III
Robert R. Laser, III (BPR 31202)
300 James Robertson Pkwy., Ste. 402
Nashville, TN 37201
Phone: (615) 622-1122
Direct: (615) 669-5468
rob@laserlawfirm.com

*Attorneys for Third-Party Defendants
Heather Sellers and Best Sellers, LLC*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via the Court's online CM/ECF system and emailed notice to the following counsel of record:

Darrick O'Dell
Spicer Rudstrom, PLLC
Philips Plaza
414 Union St., Suite 1700
Nashville, TN 37219
Telephone: (615) 259-9080
dlo@spicerfirm.com

Timothy G. Harvey
Keane A. Barger
Riley Warnock & Jacobson, PLC
1906 West End Avenue
Nashville, Tennessee 37203
Telephone: (615) 320-3700
tharvey@rwjplc.com
kbarger@rwjplc.com

Garry K. Grooms
Zachary D. Miller
Burr & Forman, LLP (Nashville Office)
222 Second Avenue South

Suite 2000
Nashville, TN 37201
(615) 724-3229
Fax: (615) 724-3329
ggrooms@burr.com
zmiller@burr.com

Attorneys for Defendant Karen Moore

G. Kline Preston, IV
Kline Preston Law Group, PC
4515 Harding Pike
Suite 107
Nashville, TN 37205
(615) 279-1619
Fax: (866) 610-9565
kpreston@klineprestonlaw.com

R. Scott McCullough
McNabb, Bragorgos, Burgess & Sorin, PLLC
81 Monroe Ave
Memphis, TN 38103
(901) 624-0640
smccullough@mbbslaw.com

Attorneys for Defendant Michelle Foreman

Robert R. Laser, III (BPR 31202)
300 James Robertson Pkwy., Ste. 402
Nashville, TN 37201
Phone: (615) 622-1122
Direct: (615) 669-5468
rob@laserlawfirm.com

*Attorneys for Third-Party Defendants
Heather Sellers and Best Sellers, LLC*

Joe P. Leniski, Jr. (TN Bar. No. 22891)
Anthony Orlandi (TN Bar No. 33988)
BRANSTETTER, STRANCH & JENNINGS, PLLC
The Freedom Center
223 Rosa Parks Avenue, Suite 200
Nashville, Tennessee 37203
Telephone: (615) 254-8801
Email: joeyl@bsjfirm.com
aorlandi@bsjfirm.com

John Spragens (TN Bar No. 31445)
SPRAGENS LAW PLC
311 22nd Ave. N.
Nashville, TN 37203
T: (615) 983-8900
F: (615) 682-8533
john@spragenslaw.com

On this the 11th day of January, 2022.

/s/D. Gil Schuette
D. Gil Schuette